

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

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AT BALTIMORE  
CLERK U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
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TYE EDWARD EVANS \*

Plaintiff \*

v. \*

GAUDENZIA, INC. \*

Defendant \*

Case No.:

JKR11CV1042

\* \* \* \* \*

**NOTICE OF REMOVAL**

Gaudenzia, Inc., Defendant, by its attorney, James S. Aist, respectfully present the following Notice of Removal from the Circuit Court of Maryland for Baltimore City, pursuant to 28 U.S.C. §1441, *et seq*, and states as grounds for removal:

1. Plaintiff, Tye Edward Evans, has filed an action against Gaudenzia, Inc. (hereinafter “Gaudenzia”) Defendant, in the Circuit Court of Maryland for Baltimore City, Case No. 24-C-11-001397, alleging that on September 30, 2009 Tye Edward Evans was injured due to the negligence and other wrongs of Defendant as a result of Defendant’s alleged failure to properly administer Plaintiff’s medication, failure to take Plaintiff’s blood pressure, and failure to administer proper medical care while in the care and custody of Defendant. Plaintiff seeks damages for physical injuries and mental anguish sustained as a result of Defendant’s alleged negligence. A copy of the Summons, Complaint and all pleadings filed in the Circuit Court of Maryland for Baltimore City are attached hereto as Exhibit 1.

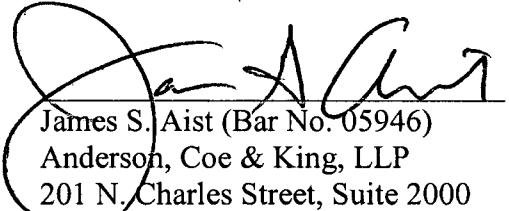
2. This action is removable to the United States District Court on the grounds of diversity of citizenship as the Plaintiff, Tye Edward Evans, is alleged to be a resident of

Baltimore, Maryland. Defendant, Gaudenzia, is a Pennsylvania corporation with its principle offices in Norristown, Pennsylvania. The amount in controversy exceeds Seventy-Five Thousand Dollars (\$75,000.00), as the damages claimed by Plaintiff are in the amount of Two Million Dollars (\$2,000,000.00).

3. Gaudenzia was served with the Summons and Complaint on March 24, 2011.

WHEREFORE, Gaudenzia hereby prays the action now pending against it in the Circuit Court of Maryland for Baltimore City be removed to this Court.

Respectfully submitted



James S. Aist (Bar No. 05946)  
Anderson, Coe & King, LLP  
201 N. Charles Street, Suite 2000  
Baltimore, MD 21201  
410-752-1630  
Attorney for Defendant Gaudenzia, Inc.

Certificate of Service

I HEREBY CERTIFY that on 21<sup>st</sup> day of April, 2011 a copy of Defendant's Notice of Removal was mailed to:

Jessie Lyons Crawford, Esquire  
Law Office of Jessie Lyons Crawford, LLC  
2601 Maryland Avenue  
Baltimore, MD 21218  
Attorney for Plaintiff



A handwritten signature in black ink, appearing to read "James S. Aist". The signature is fluid and cursive, with a large, open loop on the left side.

James S. Aist